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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

MICHAEL PEARSON, JAMES SUTER,
SILVIA SUTER, and JEANNIE STRANGE,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

PORT OF MORROW, LAMB WESTON
HOLDINGS, INC., MADISON RANCHES,
INC., THREEMILE CANYON FARMS, LLC,
BEEF NORTHWEST FEEDERS, LLC, and
JOHN DOES 1-10,

Defendants.

Case No. 2:24-cv-00362-HL

**UNOPPOSED MOTION TO EXTEND
DEFENDANTS' DEADLINE TO
RESPOND TO AMENDED COMPLAINT**

LR 7-1(A) CERTIFICATION

Counsel for Defendants Madison Ranches, Inc., Port of Morrow, Threemile Canyon Farms, LLC, Beef Northwest Feeders, LLC, and Lamb Weston Holdings, Inc. ("Defendants") conferred with counsel for Plaintiffs regarding this motion and Plaintiffs do not oppose the extension requested herein.

MOTION

Defendants respectfully move for an order under Fed. R. Civ. P. 6(b) extending Defendants' deadline to file responses to Plaintiffs' Amended Complaint (ECF 17) (whether an answer or a motion) by fourteen days to June 24, 2024. Plaintiffs do not oppose this Motion.

MEMORANDUM IN SUPPORT

1. Plaintiffs filed their original complaint on February 28, 2024. ECF 1.
2. On April 5, 2024, Plaintiffs filed their Amended Complaint. ECF 17.
3. Plaintiffs requested and Defendants Lamb Weston Holdings, Inc., Madison Ranches, Inc., and Beef Northwest Feeders, LLC agreed to waive service, making their original responsive pleading deadline May 24, 2024.
4. Plaintiffs served Defendants Port of Morrow and Threemile Canyon Farms, LLC on April 9, 2024, and their original responsive pleading deadline was April 30, 2024.
5. On April 29, 2024, Defendants jointly moved for the Court to extend the responsive pleadings deadline for all Defendants to June 10, 2024. ECF 21.
6. The Court granted that motion and set June 10, 2024, as the deadline for all Defendants to respond to Plaintiffs' Amended Complaint. ECF 34.
7. Subsequently, Defendants requested that Plaintiffs further agree to extend Defendants' deadline to respond to Plaintiffs' Amended Complaint.
8. Plaintiffs have agreed to extend Defendants' deadline to respond to Plaintiffs' Amended Complaint by 14 days to June 24, 2024.
9. This motion is made in good faith and not for purposes of delay, without waiver of any defense that may be raised in a responsive pleading or motion under Fed. R. Civ. P. 12.

Based on the foregoing, Defendants respectfully request that the Court enter an order extending Defendants' deadline to file responses to the Amended Complaint by 14 days to June 24, 2024.

DATED: June 6, 2024

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